



Gabriel M. Ramsey  
GRamsey@crowell.com  
(415) 365-7207 direct

Crowell & Moring LLP  
3 Embarcadero Center  
26th Floor  
San Francisco, CA 94111  
+1.415.986.2800 main  
+1.415.986.2827 fax

October 18, 2022

**VIA ECF**

Honorable Lorna G. Schofield, U.S.D.J.  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: ***Findigs, Inc. v. Henson Orser and Two Dots, Inc., 1:22-cv-07404-LGS: Letter Motion for Extension of Time to Respond to Complaint and Extension of Time for Telephonic Conference***

Dear Judge Schofield:


Defendants Henson Orser (“Orser”) and Two Dots, Inc. (“Two Dots” collectively “Defendants”) and Plaintiff Findigs, Inc. (“Findigs” or “Plaintiff”) (each a “Party” and collectively, “Parties”) respectfully request an order extending Defendants’ deadline to respond to Plaintiff’s Complaint (“Complaint,” Dkt. No. 1) filed on August 30, 2022. On September 20, 2022 Defendants executed and Plaintiff filed Waivers of Service, extending Defendants’ deadline to answer to November 7, 2022 (Dkt. Nos. 12 and 13). On September 15, 2022, the Court set an initial case management conference for October 26, 2022 (Dkt. No. 11).

Currently, Defendants’ deadline to respond to the Complaint is November 7, 2022. The Parties are beginning to discuss potential resolution of the claims, including whether mediation is an appropriate option, and have agreed to extend Defendants’ deadline to respond to the Complaint to allow the Parties time to pursue mediation. The Parties seek an order permitting Defendants to file their response on or before January 6, 2023. The Parties also seek an order extending the Court’s Initial Case Management Conference currently scheduled for October 26, 2022 (Dkt. No. 11) to January 25, 2023, permitting the Parties time to mediate their claims. This is the Parties’ first request for an extension of time and does not affect any other scheduled dates.

// **Application GRANTED IN PART.** Counsel is reminded that any request for an extension of time should be made at least two business days prior to the relevant deadline. The initial pre-trial conference is **ADJOURNED to November 2, 2022 at 4:10 p.m.** The conference line is //888-363-4749 and the access code is 558-3333. The parties shall file the joint letter and proposed case management plan by **October 26, 2022**. In that letter, the parties shall indicate if //they would like a referral to the Court’s mediation program or for settlement discussions before Magistrate Judge Netburn. They shall also indicate the basis for any extension of the Defendant’s deadline to answer or otherwise respond to the complaint. So Ordered.

Dated: October 19, 2022  
New York, New York

[crowell.com](http://crowell.com)

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE



Should your Honor grant the instant requests, the deadline for the response would be **January 6, 2023** and the Initial Case Management Conference would be **January 25, 2023**, or the next available date on the Court's calendar.

Respectfully,

CROWELL & MORING LLP

By: /s/ Joachim B. Steinberg

Gabriel M. Ramsey (*pro hac vice* pending)

Joachim B. Steinberg

*Attorneys for Defendants*

*Henson Orser and Two Dots, Inc.*

LEWIS BRISBOIS BISGAARD & SMITH  
LLP

By: /s/ Adam E. Collyer

Adam E. Collyer

Brian Pete

*Attorneys for Plaintiff Findigs, Inc.*

**SO ORDERED**, this \_\_\_\_\_ day of October, 2022

\_\_\_\_\_  
Hon. Lorna G. Schofield